

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

WHITE AND CO, ATTORNEYS AND  
COUNSELLORS LLC  
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In Re:

LESTER B. SMITH Jr.,  
  
DEBTOR.

Case No.: 24-20183-RG

Judge: VINCENT F. PAPALIA

Chapter: 13

### CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by Deutsche Bank Natl Trust Co. ,  
creditor,

A hearing has been scheduled for MARCH 5, 2025 , at 10:00 am .

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☐ Certification of Default filed by \_\_\_\_\_ \ \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not  
been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes

repayment as follows (**explain your answer**):

I plan to immediately apply for the LMP program by motion. In addition I will send adequate protection payments every month to Deutsche Bank starting in March 2025 of \$2,399.95. I would ask for any missed mortgage be rolled into my Chapter 13 plan.

☐ Other (**explain your answer**):

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: February 26, 2025

/s/ LESTER B. SMITH Jr.  
Debtor's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.